

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

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In re:	:	
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THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors. <sup>1</sup>	:	
	X	

**JOINT INFORMATIVE MOTION REGARDING ARGUMENT AT APRIL 28-29, 2021  
HEARING ON URGENT MOTION OF OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS TO SCHEDULE HEARING ON RENEWED MOTION  
OF OFFICIAL COMMITTEE OF UNSECURED CREDITORS PURSUANT TO  
FEDERAL RULE OF BANKRUPTCY PROCEDURE 3013 FOR ENTRY OF ORDER  
RECLASSIFYING CLASS 48A AND CLASS 55 CLAIMS UNDER OVERSIGHT  
BOARD’S PLAN OF ADJUSTMENT DATED MARCH 8, 2021**

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<sup>1</sup> The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233 (LTS)) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States District Judge Laura Taylor Swain:

The Official Committee of Unsecured Creditors (the “Committee”),<sup>1</sup> the Commonwealth of Puerto Rico (the “Commonwealth”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), the Official Committee of Retired Employees (the “Retiree Committee”), Assured Guaranty Corp. (“AGC”), Assured Guaranty Municipal Corp., (“AGM” and, together with AGC, “Assured”), and National Public Finance Guarantee Corporation (“National”) respectfully submit this joint informative motion pursuant to the Court’s *Order Regarding Procedures For April 28-29, 2021, Omnibus Hearing* [Docket No. 16475] (the “Scheduling Order”) and respectfully state as follows:

1. The following parties (the “Parties”) will appear telephonically at the April 28-29, 2021 hearing (the “Hearing”) to address, as necessary, the *Urgent Motion of Official Committee of Unsecured Creditors to Schedule Hearing on Renewed Motion of Official Committee of Unsecured Creditors Pursuant to Federal Rule of Bankruptcy Procedure 3013 for Entry of Order Reclassifying Class 48A and Class 55 Claims Under Oversight Board’s Plan of Adjustment Dated March 8, 2021* [Docket No. 16397] (the “Scheduling Motion”) as well as any and all objections, responses, statements, joinders and replies to the Scheduling Motion.

2. The following individuals may appear and speak on behalf of the Parties:

- a. Committee: Luc Despins of Paul Hastings LLP
- b. Oversight Board: Martin Bienenstock of Proskauer Rose LLP
- c. Retiree Committee: Melissa Root of Jenner & Block LLP

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<sup>1</sup> The Committee is the official committee of unsecured creditors for all Title III Debtors, other than PBA and COFINA.

3. The Parties request an aggregate of 20 minutes for argument on the Scheduling Motion, which amount would to be split evenly between, on the one hand, the Committee, and, on the other hand, the Oversight Board and the Retiree Committee (together, the “Objecting Parties”). The Parties have agreed to allocate such time as follows:

- a. Committee’s Opening Arguments: 8 minutes
  - b. Objecting Parties’ Arguments (10 minutes total):
    - i. Oversight Board: 5 minutes
    - ii. Retiree Committee: 5 minutes
  - c. Committee’s Rebuttal Argument: 2 minutes
4. Assured and National are not seeking at this time an allocation of time but reserves the right to request on the hearing date an opportunity to be heard.

*[Remainder of page intentionally left blank.]*

WHEREFORE, the Parties respectfully requests that the Court take notice of the above.

Dated: April 22, 2021

/s/ Luc A. Despins

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– and –

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Dated: April 22, 2021  
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Respectfully submitted,

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